

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED
AUG 23 2007

UNITED STATES OF AMERICA,

Plaintiff,

V.

REYNOLD EDWARD SHIVERS,
a/k/a "Eddie Shivers,"

Defendant.

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

No.

4 : 0 7 CR 00502 CAS

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term:

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal,
whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C.
§2256(2)(A)); and

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high

speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6)).

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct.

2. The "Internet" was, and is, a computer communications network using interstate and foreign telephone lines to transmit data streams, including data streams used to store, transfer and receive graphic files including, but not limited to, the visual depictions in any count of this indictment.

3. Between on or about November 2006 and May 2007, in Washington County, in the Eastern District of Missouri,

**REYNOLD EDWARD SHIVERS,
a/k/a "Eddie Shivers,"**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, M.W., to engage in sexually explicit conduct, specifically, defendant had M.W. engage in a lascivious display of her genitals, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: a still photograph taken with a MotoRZR

cellular telephone with camera bearing serial number SJUG26458E G14865G1BB ORVN, and such depiction was produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. On or about December 15, 2006, in Washington County, in the Eastern District of Missouri,

**REYNOLD EDWARD SHIVERS,
a/k/a "Eddie Shivers,"**

the defendant herein, did knowingly employ, use, persuade, induce, entice, and coerce a minor, R.S., to engage in sexually explicit conduct, specifically, defendant had R.S. engage in a lascivious display of his genitals, and said sexually explicit conduct was for the purpose of producing a visual depiction of such conduct, to wit: a still photograph taken with a Kodak Z650 Easy Share Camera bearing serial number KCKFL61100546, and such depiction was produced using materials that had been mailed, shipped, or transported in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2251(a) and punishable under Title 18, United States Code, Section 2251(e).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about March 2007 through on or about July 13, 2007, in Washington County, within the Eastern District of Missouri,

**REYNOLD EDWARD SHIVERS,
a/k/a "Eddie Shivers,"**

the defendant herein, did knowingly possess material that contains an image of child pornography that was produced using materials that traveled in interstate commerce, to wit, a Dell Inspiron laptop computer bearing serial number ORJ272-70166-680-00ZB containing a Samsung hard drive bearing serial number S09XJ10L918616, that was produced outside Missouri and therefore has traveled in interstate commerce, and which contained child pornography, including but not limited to one of the following:

1) "2007-03-24,Picture.bmp" - a graphic image file depicting a minor female in a lascivious display of her genitals;

2) "@5a.jpg" - a graphic image file depicting an adult male engaged in sexual intercourse with a minor female;

3) "4OrbPuFPE6U2rY_Bzhv16A- - _m.jpg" - a graphic image file depicting a minor female in a lascivious display of her genitals;

4) "_5Fq8c7og4VcoiOly_o4cA- - _m.jpg" - a graphic image file depicting a minor female in a lascivious display of her genitals;

5) “_xwvrJ5jVGzZsMXgP1BAFA- -_m.jpg” - a graphic image file depicting a minor female in a lascivious display of her genitals;

6) “- 08~mist9.jpg.jpg” - a graphic image file depicting a nude minor female sitting on an adult male whose genitals are exposed;

7) “4yng..mpeg” - a video file depicting an adult male engaged in oral sex with a minor female;

8) “”16yo gets raped hymen visibly penetrated little girl young porn real child sex baby.mpg” - a video file of an adult male engaged in sexual intercourse with a minor female.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT IV

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about September 2006 and on or about January 2007, in Washington County, within the Eastern District of Missouri,

**REYNOLD EDWARD SHIVERS,
a/k/a “Eddie Shivers,”**

the defendant herein, did knowingly possess material that contains an image of child pornography that was produced using materials that traveled in interstate commerce, to wit, a Dell desktop computer bearing serial number 1PRKL91 containing a Samsung hard drive bearing serial number SODFJ1L241398, that was produced outside Missouri and therefore has traveled in interstate commerce, and which contained child pornography, including but not limited to one

of the following:

- 1) "eddie's wild nite 075.jpg" - a graphic image file depicting an adult male and a minor male in a lascivious display of their genitals;
- 2) "- Best illegal coitus penetration by flashlight (underage xxx r@ygold pedo nude fuck tiny babyj lolita sister incest girl.mpg" - a video file of an adult male engaged in sexual intercourse with a minor female;
- 3) "6b06.jpg" - a graphic image file depicting a minor female engaged in oral sex with an adult male;
- 4) "!!!new-ex~2-4.jpg" - a graphic image file depicting two nude minor females embracing in front of an adult male in a lascivious display of his genitals;
- 5) "cindy015-3.jpg" - a graphic image file depicting a minor female with her mouth open before an adult male in a lascivious display of his genitals.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

CATHERINE L. HANAWAY
United States Attorney

TIFFANY G. BECKER
Assistant United States Attorney